

Revised DO Criteria Not Yet Being Implemented

Honker, William

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 1 attachments (99 KB)

WKH to Ranson 102717.pdf;

Joe,

As a follow-up to our telephone conversation today, this communication will clarify the status of the revised DO criteria for the eastern Lower Mississippi River Alluvial Plain. Although EPA's approval action on Louisiana Water Quality Standards revisions in June 2016 included these revised criteria, the Total Maximum Daily Loads (TMDLs) for the impacted water bodies will need to be revised by LDEQ and approved by EPA before NPDES permits can reflect effluent limitations based on the revised criteria. In the meantime, any NPDES permits issued for the impacted water bodies must be based on existing TMDLs which were based on the earlier DO criteria. TMDL revision is a rather lengthy process, which includes detailed technical analysis, a draft document, public review and comment, revision, and approval by the state and EPA. Thus, we have ample time to complete the ESA consultation prior to the time that revised DO criteria would be implemented in permits.

Please let me know if I can provide any further information. We look forward to your review and response to our BE.

Bill

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